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RE: October 2017 Monthly Report of Activities

Butte Priority Soils Operable Unit

Unilateral Administrative Order (UAO)- EPA Docket No. CERCLA08-2011-0011

Ladies and Gentlemen:

Pursuant to Paragraph 42 of the above referenced Order, Butte-Silver Bow submits the attached Monthly Report for activities performed at the Silver Bow Creek/Butte Area Superfund Site, as part and on behalf of the Group 1 Respondents. This monthly report covers work activities for October 2017.

Please contact me (497-6264) if you have any questions about the information in the report or need additional information about Butte-Silver Bow's work activities. Thank you.

Sincerely,

Julia Crain

Superfund Program Data Administrator Butte-Silver Bow Planning Department

Inlie M Chair

Attachment: Monthly Report

CC: Loren Burmeister, AR Project Manager

BSB Personnel

E-Mail version sent to List-Serve

Monthly Report – October 2017 Butte Priority Soils Operable Unit Silver Bow Creek/Butte Area Superfund Site Unilateral Administrative Order (EPA Docket No. CERCLA08-2011-0011)

As directed by Paragraph No. 42 of the Unilateral Administrative Order for Partial Remedial Design/Remedial Action Implementation and Certain Operation and Maintenance at the Butte Priority Soils Operable Unit/Butte Site (hereinafter, the Order) the City and County of ButteSilver Bow provides this monthly report on work activities under the Order. The work activities described in this report are consistent with the directives contained in the Order/Remedial Action Work Plan, and cover those efforts performed by ButteSilver Bow as part of the Group 1 Respondents, during October 2017.

I. Operations and Maintenance Activities

A. Source Areas/Butte Reclamation Evaluation System (BRES)

Routine O&M. In September, Source Area maintenance crews continued maintenance of sites throughout the Butte Hill. Crews completed routine O&M tasks such as trash pickup and disposal, fence repairs, and stormwater sediment basin, culvert, and inlet cleanout. Specific site work includes:

- BRES Site 155– Installed jack leg fencing and signage to prevent unwarranted vehicle access to the site. Areas previously repaired were seeded with Pal seed mix at the 1Lb/acre rate
- BRES Site 60A Repaired damaged post and cable fencing by rainstalling cable that had been cut
- BRES Site 20—Repaired area routinely damaged by vehicle access to an existing fire hydrant that is routinely used to fill water truck. The hydrant is located on the north edge **b** tite. Asphalt milling were installed on the access road and the area around the hydrant to prevent future damage and to prevent erosion. Boulders were installed to prevent vehicle damage to surrounding vegetated areas.
- BRES Site 51– Erosion repairwas conducted on the access road to the catch basin located on the site. 70 cubic yards of road mix was imported and graded to prevent future damage.
- BRES Site 174—Two small vehicle pullouts/parking areas were repaired to prevent erosion issues. The parking lots are on the north edge of the site along Buffalo Street. 20 cubic yards of asphalt millings were used to cap the parking areas and a berm was constructed to control erosion
- BRES Site 2310—Two areas on the site were damaged. The areas were repred by importing top soil and were seeded with Pal seed mix at the 1Lb/acre rate. One area was south of the county shops area. The second area wasvest of the tunnel at Harrison Avenue.
- BRES Site 30 Areas previously repaired were seeded with Pal sæmix at the 1Lb/acre rate.
- BRES Site 19 Areas previously repaired were seeded with Pal seed mix at the 1Lb/acre rate.
- BRES Site 20- were seeded with Pal seed mix at the 1Lb/acre rate
- BRES Site 29- Areas previously repaired were seeded with Pal seethix at the ILb/acre.
- BRES Site 36- Areas previously repaired were seeded with Pal seed mix at the 1Lb/acre rate.
- BRES Site 41 Areas previously repaired were seeded with Pal seed mix at the 1Lb/acre rate
- Removed graffiti in several location along the **B&P** walking trail.

BRES Program. In October 2017, Staff continued development of the 2017 Field Evaluation of Reclaimed Sites Summary Report. Staff continues to transform quantitative and analytical data into report narrative and perform quality control on spatial data to develop associated site maps depicting the findings of the 2017 evaluations.

Vegetation and Weed Controls. In October 2017, staff began assembling a list of weed targets for spring of 2018.

Native Plants. Butte-Silver Bow prepared trees for winter, by winterizing existing systems and preparing the truck for the season.

Excavation Review and Oversight. BSB personnel continue to monitor excavation and dirt-moving activities throughout the basin, including multiple Permits already issued. Coordination with contractors requires continued monitoring of access to the Mine Waste Repository. BSB personnel issued 32 Excavation and Dirt-Moving Permits during the month of October 2017; 11 permits were issued for properties in BPSOU:

- Alleyway; 1000 Block of S. Wyoming St.- Utility Repairs and Maintenance
- 00 N. Main St.-Utility Repairs and Maintenance
- 814 Empire St. Footing for House Remodel
- 701 S. Warren Ave. Footing for Tank Enclosure
- Alleyway; 400 Block E. Park St./E. Broadway St., 100 Block Covert St. Utility Repairs and Maintenance
- 2632 S. Montana St. Utility Repairs and Maintenance
- 1103 W. Woolman St. Utility Repairs and Maintenance
- 1140 Lewisohn St. Utility Repairs and Maintenance
- 205 N. Main St. Utility Repairs and Maintenance
- 1101 S. Montana St. Utility Repairs and Maintenance
- 1905 S. Idaho St. Utility Repairs and Maintenance

Institutional Controls (ICs) . Butte -Silver Bow continues to manage its responsibilities to the Institutional Controls Program through education and training in Best Management Practices for stormwater and sediment controls, excavations of hazardous waste, and a ccess to the Mine Waste Repository. B-SB personnel continue to work closely with local utility companies including NorthWestern Energy, Charter/Spectrum, Quest and others to coordinate Street Opening permits, Excavation & Dirt-Moving permits and others.

Mine Waste Repository Maintenance. The Mine Waste Repository continued operation with all active dumping directed to the lower, eastern bench which continues to be monitored and maintained on a regular basis.

• Removed materials from the Mine Waste Reposi tory and re-graded the lower deck three times using a D7 dozer.

B. Storm Water Operations and Maintenance Activities

During September 2017 standard, routine work activities were completed. In addition to inspections and monitoring of facilities, BSB Crews completed the following:

- Continuous monitoring of Syndicate Pit, CB8, CB9 and HDDs;
- Curtis Street Reclaimed area—Enhanced an existing asphalt ditch. The existing asphalt ditch prohibited vehicle access to the back of severalrivately-owned properties along East Mercury Street. Three access roads were affected by the ditch. 30 feef poly pipe was used at each access as culverting to direct storm water. Asphalt was laid at each access road and over the new culverts to address the access issues. 32 tons of asphalt and 48 cubic yards of road mix were utilized to complete this project 8 cubic yards of sediment was removed from the asphalt ditch and disposed of at the MWR.

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- Removed 48 cubic yards of sediment from the Texas Avenue HDD utilizing the Vactor truck. The sediment was disposed of at the drying beds.
- Repaired a damaged berm adjacent to Arizona Street to prevent sediment from impacting from water inlets down gradient from the area.
- Removed 40 cubic yards of sediment from the Kelley Snow Storage area and disposed of at the MWR. Installed asphalt millings to prevent erosion dange on the site and to prevent sediment from impacting the Kelley ditches.
- BRES Site 75—Installed a drop inlet in the adjacent roadway (Idaho Street) where storm water accumulated and impacted the site. 12 cubic yards of sediment was removed and dispds@f at the MWR. The area impacted from the inlet installation was capped with 56 cubic yards of asphalt millings. A 10 PVE pipe was installed to direct storm water from the drop inlet to the existing storm water ditch that dissects the site. 8 cubic yær@f six-inch rock was imported to rock armor the ditch.
- Removed 56 cubic yards of sediment, utilizing the mirexcavator, from the forebay at CB8 and disposed of at the MWR.
- Removed 15 cubic yards of sediment, utilizing the Vactor truck, from the Kawenue storm water site and disposed of at the MWR.
- Removed 15 cubic yards of sediment from the CB8 bypass and 30 cubic yards from the febray utilizing the Vactor truck and disposed of at the MWR.
- Removed 5 cubic yards of sediment, utilizing the skid steefrom the inlet structure along Ryan Road and disposed of at the MWR.
- Removed 24 cubic yards of trash, wood and debris from to locations upstream of George Street that was affecting SS04.

Superfund Storm Water Structures Inspections BSB personnel continue routine inspections of storm water facilities, storm water features and storm water structures.

Superfund Storm Water Structures Operations and Maintenance PlanThis planhas been submitted and we await agency comments.

MPDES Storm Water Permit Assistance & Monitoring – MS4: MPDES Storm Water Permit Assistance & Monitoring – MS4: Butte-Silver Bow and its consultants continue to implement requirements of its Municipal Separate Storm Sewer System (MS4) permit. The MS4 permit requires the BSB develop a Storm Water Management Program (SWMP) that addresses six control measures: public education, public involvement, illicit discharge detection and elimination (IDDE), construction site storm water control, post -construction si te storm water control, and pollution prevention/good housekeeping. Activities completed under each control measure are detailed below:

- BSB completed the annual MS4 report as required in Section I under Part IV. Monitoring, Recording and Reporting Requirements for the General Permit.
- Butte-Silver Bow Public Works and its consultants provide engineering support and assistance in reviewing storm water design plans for proposed developments in Butte, as required by the City-County Storm Water Ordinance. Assistance regarding storm water requirements was provided to potential developers as requested.
- MDEQ has decided to administratively extend the existing MS4 permit for the years 2015 2016 while a working group conducts meetings develops new permit require ments. BSB and its consultant WET have participated in multiple permittee-stakeholder meetings on this topic and will take part in the working group meetings.
- BSB began meeting with the other MS4 Cities to develop a MS4 permit that is acceptable to the cities and DEQ.

C. Water Quality District Activities

Water Quality District Completed the following tasks in October 2017:

- In collaboration with MBMG, completed the domestic well sampling for the Clark Tailings and Old Landfill Controlled Groundwater area.
 - All results indicate no exceedances
- Performed visual surveys of potential wells for the expansion of the Domestic Well Sampling Program
 - o 60 wells were visually identified or are already known to exist through previous sampling efforts
 - 35 wells could not be visually identified; these potential well owners will be contacted through mailers.
 - Currently preparing a document for EPA, DEQ, AR, and others that summarizes the results and field observations of visual survey.
- Consulted with Planning Department regarding a potential domestic well that borders the Butte Alluvial and Bedrock Controlled Groundwater Area
 - o Property owner was informed of the well's location to the controlled groundwater area and the necessity that it is tested regularly for water quality.
- Received and reviewed CTEC documents on the Montana Pole Plant five year review.
 - Documents include CTEC's comments of the latest 5-year review and Question and Answer document developed by CTEC.
- Initiated review of the BPSOU 2015 Draft Interim Groundwater Monitoring DSR comment letter.
- Reviewed MBMG's September 2017 Butte Mine Flooding Report
- Reviewed Montana DEQ's fourth 5-year review report for the Montana Pole Treating Plant Site and prepared comments.

D. GIS Activities

Primary work in the reporting period included:

- Plotted map of BSB and Dennehy ownership in the vicinity of 803 N. Main Street.
- Plotted BSB and AR property ownership in vicinity of 121 Capitol Hill Street, Walkerville.
- Updated BPSOU/BRES site webmap.
- Updated BPSOU/BRES Superfund storymap.
- Updates to BRES site webapp.
- Plotted Excavation Control District map for Superfund Staff
- Mapped Morning Star Stope Book at S. Dakota and W. Mercury for Superfund Staff.
- Exported RMAP parcels to Excel.
- Exported shapefile of RMAP parcels by abatement type.
- Performed edits and updated symbology of BRES Web.
- Exported BRES Survey 123 data points for O&M work completed in September 2017 for Monthly Report.
- RMAP and Superfund Database meeting and SQL research.
- Map of selected AR parcels in the vicinity of the Lexington Mine.
- Plotted map of sampled and abated properties within BPSOU.
- Plotted map of AR ownership in the vicinity of the Alexander Mining Claim.

- Attended RMAP database meeting and provided list of recommendations for compatibility with BSB GIS Data Management.
- Edited and transmitted BSB BRES Quad 4 site alterations to Pioneer Technical Services.
- Uploaded edited BSB BRES Quad 4 site alterations to BSB GIS Server and AGOL.
- Prepared an analysis of BSB BRES Ste Names and acreages in Microsoft Excel for Operations Manager.
- Defined the RMAP sampling codes to update RMAP GIS attribute data to upload RMAP properties to AGOL and develop a webmap and webapp for RMAP Division to use in outreach activities.
- Developed a BPSOU BRES and RMAP storymap in AGOL.
- Scanned West Side Soils maps and archived on the GIS Server.
- Plotted 2016 aerial photography in the vicinity of the Berkeley Pit for bird mitigation-related analysis.
- Provided final feedback on BSB Stormwater Inspection and O&M Database for finalization.
- Conducted review of BRES, AGOL, and Survey 1,2,3 web app review.
- Weekly review of ArcGIS Online for O&M and Stormwater Inspection data. Data download
 and entry into the BRES database; spatial data downloaded for QA/QC and archival on the
 BSB GIS system.

II. Residential Metals Abatement Program

A number of standard work activities are on-going and addressed each month, including:

- Identifying soil, attic and cap protection projects.
- Data base and GIS tracking system; progress and annual reports
- Completion statements and deed attachments for projects completed
- · Re-insulating properties previously abated
- Paint inspections
- EBL investigations
- Residential soil/basement sampling
- Residential attic sampling
- Residential interior dust sampling
- Provide use of HEPA vacuums
- Provide blood lead sampling through WIC clinic and establish database for blood lead results

Projects in Progress (November 2017)

434 S. Colorado – Attic

415 Pennsylvania – Attic

625 S. Wyoming – Soil

223 Virginia - Soil

949 Antimony – Basement

Projects Completed: (October 2017)

928 Lexington – Attic

1131 W. Silver – Attic

319 N. Montana – Attic

205 S. Crystal – Attic

2230 Grand - Attic

2700 Aberdeen – Attic 72 Missoula – Attic 2414 Parrot – Attic 803 W. Granite – Soil 1039 Oregon – Soil 513 N. Montana – Soil 900 S. Main – Soil 529 W. Copper – Soil

Upcoming projects:

3225 Bayard – Attic 112 S. Alabama – Attic 1805 Carolina – Attic 506 W. Aluminum – Attic 610 W. Mercury – Basement East Galena St. Lot – Soil 216 N. Clark – Soil

Projects Completed in (2017) – 101 Properties Sampled in (2017) – 181 Mailers sent in (2017) - 600